



# LABOR COUNCIL FOR LATIN AMERICAN ADVANCEMENT (LCLAA)

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March 1, 2000

The Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, DC 20024

Re: *In the Matter of GTE Corporation, Transferor, and Bell Atlantic Corporation, Transferee, For Consent for Transfer of Control, CC Docket 98-184*

Chairman Kennard and Honorable Commissioners:

The Labor Council for Latin American Advancement ("LCLAA") is a national Latino trade union association representing 1.4 million Latino working men and women in 43 international unions in 64 chapters in 17 states and Puerto Rico. As the Latino Constituency group within the AFL-CIO, LCLAA advocated for the rights of all Latino workers and their families in all phases of the American trade union movement and the political process. Through out national advocacy and political work, LCLAA strives to achieve social dignity, economic and political justice, and a higher standard of living for every Latino worker and family.

LCLAA welcomes the opportunity to reiterate its support for the proposed merger of Bell Atlantic Corporation and GTE Corporation, and respectfully urges the Commission to approve their pending transfer of control pursuant to the voluntary merger commitments proposed in the companies' Supplemental Filing of January 27. LCLAA believes that the merger is in the public interest because it will provide a wide range of services to the broadest possible spectrum of consumers, offer increased competition in telecommunications markets nationwide, and promote job stability and growth for workers in both companies.

As an initial matter, LCLAA reasserts its unqualified support for the efforts of the Communication Workers of America ("CWA") and the International Brotherhood of Electrical Workers ("IBEW") to seek approval for the merger of Bell Atlantic and GTE.<sup>1</sup> For more than a year, CWA and the IBEW have clearly and explicitly enunciated the procompetitive benefits of the Bell Atlantic/GTE merger – ranging from growth in the local and long distance markets, to the spread of advanced services related to the Internet and the provision of bundled

<sup>1</sup> LCLAA incorporates by reference its ex parte comments made earlier in this proceeding, in which LCLAA wholeheartedly supported CWA and the IBEW and their views on the Bell Atlantic/GTE merger. See, *Letter to Honorable William Kennard from Henry C. Gonzales and Oscar Sanchez* (March 31, 1999).

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services. Additionally, these labor organizations have illustrated the positive impact of the proposed combination on telecommunications workers and working families nationwide. In sum, CWA and IBEW are convinced that the merger will position the combined company and its organized labor force to grow in the international telecommunications market and will help ensure the preservation and advancement of affordable, quality telecommunications services for all Americans. On this basis alone, LCLAA believes that there is ample substantive evidence to justify the grant of the Bell Atlantic/GTE application.

Nevertheless, LCLAA would like to take this opportunity to briefly address the specific benefits likely to be accrued by Bell Atlantic and GTE's proposal for fostering out-of-region competition. LCLAA believes that the \$500 million out-of-region commitment of the post-merger company will open the door to exactly the kind of facilities-based competition that Congress intended when it enacted the Telecommunications Act of 1996. Further, Bell Atlantic and GTE's determination to enter markets nationwide will eventually guarantee countless consumers access to a range of competitive alternatives for local, long distance, wireless and advanced services – all provided by companies with a demonstrated commitment to customer service. Additionally, because this expansion will not be tied to the use of a specific telecommunications technology, the merged company will be free to implement the most advanced solutions as its buildout moves forward and, thus, provide the most capable systems available in the marketplace.

Finally, LCLAA envisions that Bell Atlantic/GTE's out-of-region competition plans will provide an ideal platform for the growth and expansion of their existing labor force. The jobs that will accompany the out-of-region expansion, beginning with the implementation of basic infrastructure and continuing with the provision of service will benefit local economies and individual working families nationwide. Therefore, the out-of-region proposal presented in the Supplemental Filing not only offers consumers a guarantee of increased competition and access to the systems with the most up-to-date capabilities, but also promises economic growth for American workers. These are all benefits that LCLAA believes are at the heart of the public interest.

Therefore, LCLAA respectfully requests that the Commission approve the proposed merger of Bell Atlantic and GTE based on the structure set forth in the companies' Supplemental Filing.

Thank you for your favorable consideration.



Henry C. Gonzalez, President



Oscar Sanchez, Executive Director